

EXHIBIT M

RE: Deposition

From: R. J. Shannon <rshannon@shannonleellp.com>
To: Mark Smith <msmith@bn-lawyers.com>
Cc: Steve Sather <ssather@bn-lawyers.com>; David Stern <dstern@bn-lawyers.com>; Jetall Legal <legal@jetallcompanies.com>; Jeff Steidley <jeff@texlaw.us>

Mon, Jun 10, 2024 at 1:32 PM CDT (GMT-05:00)

Mark,

The Trustee has panels tomorrow and Wednesday, and hearings on Thursday and Friday. He moved his schedule around last week and you cancelled it last minute. I think you are going to need to just ask him on the stand. It seems only tangentially relevant to any of the requirements of section 1129 anyway.

As far as the other things:

- Revenues/Expenses—Attached are (a) the copies of the monthly operating reports and (b) a summary of revenue received. I can try to get the Trustee to finish the May 2024 MOR early but it's not due until 6/20.
- Claims—You guys have the same insight to the claims as we do through the Debtor's schedules and the claims register.
- Administrative Expenses—I can ask the Trustee to have an estimate ready by the hearing, but these things are determined by a process.
- Cash—I can get you this number, but I assume you want it as of the hearing.

Thanks,
R. J.

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R. J. Shannon

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From: Mark Smith <msmith@bn-lawyers.com>
Sent: Monday, June 10, 2024 11:44 AM
To: R. J. Shannon <rshannon@shannonleellp.com>
Cc: Steve Sather <ssather@bn-lawyers.com>; David Stern <dstern@bn-lawyers.com>; Jetall Legal <legal@jetallcompanies.com>; Jeff Steidley <jeff@texlaw.us>
Subject: Deposition

R.J.,

Given the Court's ruling on the motion for continuance, please provide dates this week for the trustee's deposition. Also, can you provide an accounting for the revenues/expenses for the estate since the trustee has taken over. Also, how much does the estate hold now and what is current administrative costs and do you have a schedule of creditors. Thank you.

Mark

Mark E. Smith
Barron & Newburger, PC



Attachments

- Rents Received Report.pdf
- txsb-4_2023-bk-34815-00131.pdf
- txsb-4_2023-bk-34815-00132.pdf
- txsb-4_2023-bk-34815-00220.pdf
- txsb-4_2023-bk-34815-00354.pdf